



April 20, 2020

To: All Certified Underground Storage Tank System Technicians and Removers and Registered Tank Owners

Regulated Underground Storage Tank System Removal During the COVID-19 State of Emergency

As part of overall state social distancing efforts during the COVID-19 state of emergency and catastrophic health emergency, there may be occasions when the Maryland Department of the Environment's Oil Control Program (OCP) staff will not be physically on site for the removal of a regulated underground storage tank (UST) system. Maryland-certified UST system technicians or removers (certified contractors) that are essential businesses as determined by the Governor's Executive Orders, may continue to perform UST system removals in the state without the on-site presence of OCP staff provided the requirements detailed below are followed.

UST Removal Requirements:

- 30-day notifications shall be submitted to the OCP and the UST removal date scheduled with OCP staff, as usual. In order to ensure that the notification is received in a timely manner, it should also be e-mailed to the Remediation Division regional supervisor for the work location. Relevant project details will need to be communicated to OCP staff to allow adequate planning to manage the UST removal remotely if necessary.

Regional supervisor contact information:

- Northern Region (BC, BA, CL, FR, WA, AL, GA)
 - Ellen Jackson – ellen.jackson@maryland.gov; 410-537-3482
- Southern Region (HO, MO, PG, CH, SM, CA)
 - Jim Richmond – jim.richmond@maryland.gov; 410-537-3337
- Eastern Region (AA, HA, CE, KE, QA, CO, TA, DO, WI, WO, SO)
 - Susan Bull – susan.bull@maryland.gov; 410-537-3499
- All ancillary work associated with completion of the project (sample delivery, sample analysis, soil disposal facility, tank disposal facility, clean fill source, etc.) must be able to be performed. Confirmation of availability from all relevant associated parties must be documented prior to beginning the work.
- A conference call must be conducted with the certified contractor and OCP staff a minimum of 48 hours prior to starting the work to discuss and confirm relevant details of the upcoming project.

- On the date(s) the work is performed, the certified contractor must be on site at all times during all aspects of the UST removal work (surface removal, UST fluids removal, tank cleaning, tank inerting, tank removal and inspections, soil excavation, soil sampling, excavation backfilling, surface completion, etc.).
- If OCP staff is unable to be on site, the certified contractor must ensure that direct communication by phone, video conference, email, or other method to foster effective remote communication will be maintained between the certified contractor and OCP staff throughout the project.
- At the conclusion of the project, OCP will issue a Tank Removal Form, as usual. Any additional information or documentation required due to OCP staff's inability to be on site will be outlined on the Tank Removal Form.
- A comprehensive, compliant UST Removal Report will be required to document the work, as usual. OCP expects that the UST Removal Report will contain an enhanced level of documentation relative to typical reports (photographs, site map, sample location map [horizontal and vertical locations], etc.) and must include all information specified in the Tank Removal Form, issued by OCP. Any report that is determined to be inadequate or lacking required items will not be accepted.
- The UST owner understands that MDE reserves the right to require additional site assessment activities following review of the UST Removal Report and prior to considering the case for closure if MDE determines there is concern for residual petroleum contamination to remain from the removed UST system.

This memorandum does not create any exceptions to the Executive Orders issued by Governor Hogan or excuse the failure to comply with any applicable UST system removal and/or ancillary work requirement, or generally relieve Maryland-certified UST system technicians or removers, or UST owners from other regulatory requirements, including local or federal laws. It is the responsibility of a business, organization or facility to determine whether it is considered essential and can be conducting work during the state of emergency. For further information, please find the Governor's Executive Orders at this web page: <https://governor.maryland.gov/category/executive-orders/>.

This guidance is intended to only apply until the COVID-19 state of emergency is terminated and the catastrophic health emergency is rescinded. You should continue to monitor the MDE website for updated information regarding UST systems during this unprecedented time. <https://mde.maryland.gov/programs/LAND/OilControl/Pages/index.aspx>.